

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MICHAEL GRECCO PRODUCTIONS, INC.,

Plaintiff,

Case No. 18-cv-03260-PKC-JO

- against -

ALAMY INC. and ALAMY LTD.,

Defendants.

DECLARATION OF NANCY E. WOLFF

NANCY E. WOLFF declares as follows:

1. I am a member of the Bar of this Court and a partner in the law firm of Cowan, DeBaets, Abrahams & Sheppard LLP, attorneys for defendants Alamy Inc. and Alamy Ltd. (collectively, “Defendants”) in this proceeding. I submit this declaration in support of Defendants’ letter requesting a pre-motion conference and setting forth the bases for Defendants’ anticipated motion to dismiss the amended complaint of plaintiff Michael Grecco Productions, Inc., dated October 10, 2019, pursuant to Fed. R. Civ. Proc. 12(b)(2) and 12(b)(6).

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the transcript of the deposition of Jane Serember, dated September 5, 2019.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York
October 23, 2019


NANCY E. WOLFF